

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**BLUE SPIKE, LLC**

**Plaintiff**

**VS.**

**TEXAS INSTRUMENTS, INC.,**

**Defendant.**

**BLUE SPIKE, LLC**

Plaintiff

**VS.**

**L-1 IDENTITY SOLUTIONS, INC. and  
MORPHOTRUST USA, INC.,**

**Defendants.**

§ CIVIL ACTION NO. 6:12-CV-499 LED

## § LEAD CASE

§ CIVIL ACTION NO. 6:12-CV-680 LED

**DECLARATION OF DR. MOHAMED LAZZOUNI IN SUPPORT OF DEFENDANTS'**  
**REPLY IN SUPPORT OF MOTION TO TRANSFER**

I, Dr. Mohamed Lazzouni, do hereby declare and state as follows:

1. I submit this Declaration in support of the Reply in support of the Motion to Transfer filed by Defendants L-1 Identity Solutions, Inc. (“L-1”) and MorphoTrust USA, Inc. (“MorphoTrust”) (collectively, “Defendants”). I have personal knowledge of the facts set forth in this Declaration, except as otherwise stated. I am competent to testify as to all matters stated, and if called upon to do so, I would testify to the facts set forth in this Declaration.

2. I am the Chief Technical Officer of Defendant MorphoTrust.

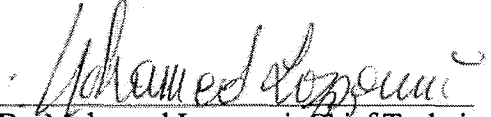
3. MorphoTrust has a parent corporation, L-1. L-1's parent corporation is Morpho USA, Inc. Morpho USA Inc.'s parent corporation is Safran, USA Inc.

4. MorphoTrust has a small number of its own local ID service centers in Texas the majority of which are tiny (e.g., approximately 1000 square foot) leased retail locations where individual consumers go to get fingerprints taken for things like background checks and getting licensed.

5. No technology or product development or manufacture takes place in these retail service centers, and there are no records or witnesses relating to the research, development, or manufacture of the technology used at these centers. All technology and product development for the Accused Products (identified in plaintiff's Complaint) takes place in New Jersey.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10th day of January, 2013, in Billerica, Massachusetts.

  
Dr. Mohamed Lazzouni, Chief Technical  
Officer